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BOS – The Swedish Trade Association
for Online Gambling

The logo for BOS.nu, featuring the text "BOS.nu" in a white, sans-serif font on a dark grey rectangular background.

Referral statement S2024/01621, Sweden's accession to the Council of Europe's convention on the manipulation of results in sport (the Macolin Convention)

About BOS

The Swedish Trade Association for Online Gambling – BOS – represents 18 gambling companies that are active in the Swedish gambling market.¹ This makes us Sweden's largest trade association within our industry. All members have a licence/permit issued by the Swedish Gambling Authority and all are independent from states and governments in their ownership structure and board composition.

BOS position

BOS endorses Sweden's ratification of the Macolin Convention. At the same time, BOS wants to point to the need for a redefinition of the convention's term "illegal sports betting" and to underline the importance of international betting companies being included in the joint work to fulfill the convention.

Advocacy

Match-fixing is by its very nature cross-border, which is why the fight against match-fixing must also be cross-border, to succeed. Most BOS member companies offer sports betting to their customers and have done so for a long time, in some cases for almost a hundred years.² During these years, a cross-border cooperation has been designed with the aim of combating match-fixing – between betting companies and between different countries, as the individual member companies of BOS operate in many countries. The clearest expression of this international cooperation is the organization International Betting Integrity Association (IBIA)³, founded and run by the

¹ <https://www.bos.nu/en/our-members/>

² [https://en.wikipedia.org/wiki/William_Hill_\(bookmaker\)](https://en.wikipedia.org/wiki/William_Hill_(bookmaker))

³ <https://ibia.bet>

international betting companies with the aim of sharing information between each other regarding suspicious betting.

BOS sees positively that states have increasingly paid attention to the problem of match-fixing in recent years. States possess competence and, not least, mandates that private companies and organizations often lack, which is why the involvement of states is crucial to achieving a successful result. At the same time, it must be emphasized that the private betting companies and their industry organizations are equally crucial for a successful result, as these have access to international player data, which authorities or state gambling companies with operations in only one country rarely have.

While private operators and their representative organizations are involved in the exchange of integrity data via Council of Europe's (CoE) Group of Copenhagen, alongside regulators, data providers and law enforcement bodies, it is very worrisome that the CoE's so-called "Follow-up Committee" only permits state gambling companies and their trade associations representation in the committee. The Committee, which is known to be considering important issues such as the availability of different types of bets and the impact on integrity, has chosen to excluded private operator representation as observers since its establishment in 2020.

As a result, the majority of the global sports betting sector, as presented by private companies, has no input into the Committee's discussions and data considered as part of the CoE betting integrity policy deliberations. This means that while Sweden will commit to the convention, the most important discussion platform within that framework will not have any industry representation for Sweden's private betting companies, which make up the majority of the market. It is difficult to see how any mechanism of that nature can be deemed appropriate and representative, nor how that can advance cooperation and collaboration with private companies on integrity.

It is also important to note that the convention's definition of illegal betting has, as had been predicted by private operators at the time of its development, caused significant delay in advancing the ratification of the convention for EU countries. The definition affects all gambling companies that lack a local gambling licence in a jurisdiction, even if the state in such a jurisdiction only licenses itself via a monopoly. In these and some other cases, however, EU case law determines it is not illegal to accept customers from there in another EU country, if you have a gambling licence in another EU state. The Council of Europe's definition in this regard is simply incorrect and makes international cooperation against match-fixing more difficult. It also makes it very difficult for Malta, which is home to a large part of the private betting sector in Europe, to ratify the convention, and the definition is counterproductive to international cooperation.

It is vitally important that Sweden's licensed private companies and international betting companies and their industry organizations are included in the operational work against match-fixing, mainly manifested in the association Group of Copenhagen, but also the policy assessment taking place in the Follow-up Committee. A broad representation including privately owned and listed gambling companies is necessary to deliver practical and workable solutions.

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